

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DESIGNLYNX PRODUCTS LLC,

Plaintiff,

v.

THE INDIVIDUALS, PARTNERSHIPS AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE “A”,

Defendant.

Case No. 1:24-cv-03575

**Judge Thomas M. Durkin
Magistrate Judge Jeannice W. Appenteng**

DECLARATION OF XIN CHEN

I, Xin Chen, declare as follows:

1. I am the Chief Executive Officer of Larryhot Trading Co., Ltd. (**Larryhot**), which operates the internet store, match-better.com (the **Store**), identified in this lawsuit. In this capacity, I have personal knowledge of the Store’s operation and sales and have access to Larryhot’s business records.

2. I make this declaration based on my personal knowledge and after reviewing Larryhot’s business records. If called as a witness, I can competently testify to the matters stated herein.

3. Larryhot is incorporated and has its principal place of business in China. Larryhot operates the Store exclusively in China. Larryhot has never owned or utilized an office, hired employees, agents, or representatives, maintained bank accounts, owned assets or properties, or qualified to do business in Illinois or any other part of the United States.

4. Neither the Store nor Larryhot has targeted Illinois residents with their advertisements, nor directed any marketing efforts or materials at Illinois.

5. Designlynx Products LLC (the **Plaintiff**) alleges the Store has infringed on its trademark and copyrights. The Store's operations team reviewed the complaint, the exhibits attached thereto, and the snapshots of the Store's products that Plaintiff provided as **Exhibit A**. After reviewing these materials, the operations team conducted a diligent search of the Store's sales records for the allegedly infringing products. Specifically, the operations team accessed the backend data system of the Store's website and performed a thorough search using the Plaintiff's brand name, product descriptions as keywords, including "Carrier," "club," "DesignLynx", "Golf Club Travel Bag," "golf," "Portable Golf Club Carrier," "Portable," "SILO Golf Club Carrier," "SILO," and "Transporter," *etc.* The operations team also searched the alleged copyrighted works mentioned in the complaint against the pictures in our backend data system. They then manually reviewed the search results against the images on the Plaintiff's website and the alleged copyrighted works to identify any listings matching by appearance or use of similar brand keywords.

6. **Exhibit B** contains complete and accurate sales records of the search results, maintained in the ordinary course of Larryhot's business. Exhibit B shows that the Store has made *no* sales of the allegedly infringing products in Illinois, but only a single sale to Florida, resulting in total revenue of \$26.58. The buyer's name was "Vladmir SLO-FTE Karen" and shipping address was "1834 Gunn Highway, Odessa, Florida 33556."

7. The Store initially listed the allegedly infringing products for sale on or around March 19, 2023. The Store's operations team, responsible for monitoring products on rival e-commerce websites, identified similar products on those websites and found multiple suppliers of the alleged products. Several different brands and sellers are marketing similar products. **Exhibit C**.

8. The Store was not aware, nor had any reason to be aware, that it was potentially infringing any copyrights, as it did not believe that any company had exclusive rights to the products alleged in the complaint. The Store has not attempted to market or pass off its products as those of

the Plaintiff or any other party.

9. When listing the images shown in Exhibit A, the operations team used the images available from the suppliers or other sources which did not contain the “Rival and Revel” or “SILO” marks. The Defendant and the Store did not remove the alleged “Rival and Revel” or “SILO” marks from those images. Nor did they know or have reason to know that those marks were removed or altered from the images, or that distribution of the alleged products would induce, enable, facilitate, or conceal an infringement of the alleged marks.

10. The Store has one PayPal account for the allegedly infringing products, Rnalemoa@outlook.com, with a total frozen amount of \$238,288.85 due to the asset restraints imposed by this litigation.

11. The Store still plans to continue business operations. However, the existing restraints significantly hinder the Store’s liquidity and ability to maintain normal operations.

12. Larryhot was notified of the current litigation through e-mail and was not served through the central authority of China in accordance with the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents.

13. Upon notice of the current litigation, Larryhot has permanently removed the listings of the allegedly infringing products. While Larryhot is moving to challenge the Preliminary Injunction Order (Dkt. 40), Larryhot assures the court it will not relist the allegedly infringing products for sale until further ordered by the court.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and accurate.

Executed on this 4 day of July, 2024, in Xiamen, Fujian Province, China.

Dated: July 4, 2024

By: Xin Chen
Xin Chen

EXHIBIT A

🌸 Free Shipping Over\$39.98 | Multiple offers

SHOP NOW

All products

AS LOW AS \$5.99

Check Your Order Status



Portable Golf Club Carrier 🔥 New Product First Launch Offer-

49% OFF 🔥

\$19.99

\$39.99

Save 50%

📦 648.1K Month Sold

👍 It's been recommended by 48.3K people on Facebook, Twitter and Instagram

Klarna.

Shop now. Pay in 30 days. [Learn More](#)

📄 Share on social profile and get coupon code!

Share >

5.00% OFF

Get coupon

NS 📄

Color

Grey

Black

Blue

All color

QTY

ONLY 1

🔥 HOT SALES 🔥 BUY 2 GET 1 FREE(FREE SHIPPING)

Quantity

- 1 +

RECENTLY VIEWED <



Free Shipping Over\$39.98 | Multiple offers

SHOP NOW

All products

AS LOW AS \$5.99

Check Your Order Status



Portable Golf Club Carrier 🔥 New Product First Launch Offer-

49% OFF 🔥

\$19.99

\$39.99

Save 50%

📦 648.1K Month Sold

👍 It's been recommended by 48.3K people on Facebook, Twitter and Instagram

Klarna.

Shop now. Pay in 30 days. [Learn More](#)

📄 Share on social profile and get coupon code!

Share >

5.00% OFF

Get coupon

NS

Color

Grey

Black

Blue

All color

QTY

ONLY 1

🔥 HOT SALES 🔥 BUY 2 GET 1 FREE(FREE SHIPPING)

Quantity

— 1 +

RECENTLY VIEWED <



🌸

Free Shipping Over\$39.98 | Multiple offers

SHOP NOW

All products

AS LOW AS \$5.99

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Shop now. Pay in 30 days. [Learn More](#)

📄 Share on social profile and get coupon code!

Share >

5.00% OFF

Get coupon

NS 📄

Color

Grey

Black

Blue

All color

QTY

ONLY 1

🔥 HOT SALES 🔥 BUY 2 GET 1 FREE(FREE SHIPPING)

Quantity

1



RECENTLY VIEWED <



🌸 Free Shipping Over\$39.98 | Multiple offers

SHOP NOW

All products

AS LOW AS \$5.99

Check Your Order Status



Portable Golf Club Carrier 🔥 New Product First Launch Offer-

49% OFF 🔥

\$19.99

\$39.99

Save 50%

📦 648.1K Month Sold

👍 It's been recommended by 48.3K people on Facebook, Twitter and Instagram

Klarna. Shop now. Pay in 30 days. [Learn More](#)

📄 Share on social profile and get coupon code!

Share >

5.00% OFF

Get coupon

NS 📄

Color

Grey

Black

Blue

All color

QTY

ONLY 1

🔥 HOT SALES 🔥 BUY 2 GET 1 FREE(FREE SHIPPING)

Quantity

- 1 +

RECENTLY VIEWED <



Match-better.US

Express checkout



OR

Contact information



Merc Amg (mercamg0044@gmail.com)
[Log out](#)

☐ Email me with news and offers

Shipping address

Use a new address

Country/Region
United States (US)

First name
Merc

Last name
AMG

Address
21301 Powerline Rd

Apartment, suite, etc. (optional)

City
Boca Raton

State
Florida

ZIP code
33433

+1

Phone
(618) 476-5344



Portable Golf Club Carrier 🔥 New
Product First Launch Offer-49% OFF 🔥 **\$ 19.99**
Grey / ONLY 1

Coupon code

Apply

Subtotal	\$ 19.99
Shipping Insurance	\$ 0.60
Shipping	\$ 5.99

Total **USD \$ 26.58**

WHY CHOOSE US?



100% Satisfaction
If you have any questions within 30 days, you can contact our after-sales center at any time for returns and refunds



Over 34.245 successfully shipped orders
We made as much happy customers as many orders we shipped. You simply have to join our big family.

EXHIBIT B

All Orders

Export

Import

All

Unfulfilled

All order status

All delivery...

Start date

End date

All paymen...

All payment c...

Country/ R...

Payment Status

portable-golf-dub-carrier



Search

<input type="checkbox"/>	Order number	Payment time	Payment Status	Payment method	Payment channel	Logistics status	Total Amount	Product	Country/ Region	Operation
<input type="checkbox"/>	8504S149375	2023-12-21 22:36:03	Paid	PayPal	PayPal	Delivered	\$26.58	1pieces of product	United States of America	Result page

1 total

<

1

>

50 / page

match-better

Order

All Orders

Abandoned Order

Product manage...

Settings

< All Orders


Order Details

Invoice

Action

Modify delivery

Order Overview

Product	Specifications	Quantity
 <div>Portable Golf Club Carrier 🔥 New Product First Launch Offer-49% OFF 🔥 SKU: IX1539247-灰色</div>	Grey-ONLY 1	1

Shipping Address

Edit

Name	Vladmir SLO-FTE Karen
Address	1834 Gunn Highway
Apartment	-
City	Odessa
Country/Region	United States of America
Province/State	Florida
Postcode	33556
Phone	+1 8136003523
Extra information	-

Order Information

Order status:Completed

Payment status:Paid

Total Amount:\$26.58

Order number:8504S149375

Payment number:1YP029409M149105J

Payment method:PayPal

Payment channel:PayPal

Generation time:2023-12-21 22:32:44

Payment time:2023-12-21 22:36:03

Logistic order number:JSELN2868020120YQ

Client

Unsubscribed

Visitors

Name

Adolfo Foozler

Contact Information

Mailbox

adolfofoozler@gmail.com

EXHIBIT C

7/3/24, 3:11 PM Amazon.co.jp: Golf Club Organizer, Golf Club Holder, Holds 6 Golf Clubs Holders, Organize, Store, Golf Clubs, Portable, Convenient, Club Case, Auger Holder : Sports & Outdoors

amazon.co.jp

Deliver to United States

Sports

Search Amazon.co.jp

EN

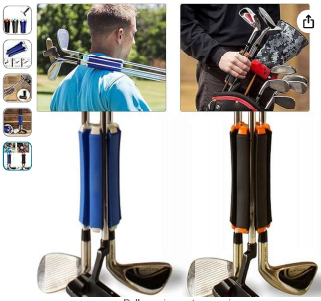
Help: Sign in Account & Lists

Returns & Orders

Amazon Points: Check your balance Help Center Best Sellers Amazon Basics Today's Deals Prime Video Music Prime New Releases Japanese Books Food & Beverage Computers & Peripherals Amazon Fashion Gift Cards Home & Kitchen

Sports & Outdoors Bicycles Outdoors Fitness & Training Fishing Golf Sportswear & Shoes Bargains Amazon Ranking

Sports & Outdoors > Golf > Golf Clubs > Complete Sets



Roll over image to zoom in

Brand: Coicueci

Golf Club Organizer, Golf Club Holder, Holds 6 Golf Clubs Holders, Organize, Store, Golf Clubs, Portable, Convenient, Club Case, Auger Holder

2.0 1 rating

¥1,199

Amazon Points: 12pt (1%) See details

Color: gray

¥1,199

1 option from ¥999

Brand

Coicueci

Color

gray

Material

Plastic

Number of Dividers

6

Manufacturer

Coicueci

About this item

- 1.High quality plastic golf club organizer can hold six golf clubs together
- 2. Size: Diameter 6cm, Height 14.5cm
- 3.Easy to install, easy to use golf club holder Compact and convenient new stylish club carrying case that can carry 6 clubs at a time
- 4. Prevents Club Interference: The clubs can be stored in the bag while bundling them, preventing them from being caught in the bag
- 5.Can be placed directly into most golf bags, perfect for walking in the car for a few days. Keeps clubs organized for easy self-play

[See more product details](#)

[Report an issue with this product](#)

¥1,199

Amazon Points: 12pt (1%) See details

¥2360 delivery Tuesday, July 16, Details

Or fastest delivery Wednesday, July 10, Details

Deliver to United States

Only 3 left in stock - order soon. Click here for details of availability.

Quantity: 1

Add to Cart

Buy Now

Ships from Amazon

Sold by フルーツゾーン

★★★★☆ (942 ratings)

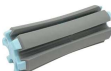
Secure transaction

Add gift options

Add to List

Customers who viewed this item also viewed


Page 1 of 7



ゴルフクラブホルダー クラブキャリーケース ゴルフクラブ 固定 固定クリップ 収納

★★★★☆130


¥1,099-¥1,199



Club Carrying Case, Golf Club Holder, Golf Club, Storable, Secure, Portable, Convenient Club, Auger Holder, Golf Club Bracket, Retaining...

★★★★☆348


¥1,450



TASMAS Golf Club Holder, Perfect for Self Play, Fixed, Storage, Club Case, Golf Club Bracket, Club Carrying Case

★★★★☆344


¥1,980



Generic Golf Equipment Club Carrying Case Golf Club Holder Golf Club Fixed 6 Clubs Club Case - Black Orange

★★★★☆34


1 offer from ¥1,097



Golf Club Holder, Golf Club, Fixed, Storable, Golf Club Storage, Portable, Convenient, Club Case, Auger Holder, Retaining Clip, Golf Club...

★★★★☆6


¥1,999



Pisifio Golf Club Holder, Stand, Portable, Convenient Goods, Storage, Self, Practice Range

★★★★☆6

¥1,882



ダイヤゴルフ(DAIYA GOLF) クラブキャリーケース SLO GOLF CLUB CARRIER 収納スタンド セルフプレーに最適 コンパクト CC-040

★★★★☆208

¥1,700-¥3,850

What do customers buy after viewing this item?

https://www.amazon.co.jp/-en/Organizer-Holders-Organize-Portable-Convenient/dp/B0C7GRKDVV?th=1

1/4

7/3/24, 3:22 PM

Sport Panda Golf Club Carrier, Golf Bag Tubes Organizer Stand for Holding 6 Golf Clubs | Lazada PH

FEEDBACK

SAVE MORE ON APP

SELL ON LAZADA

CUSTOMER CARE

TRACK MY ORDER

LOGIN

SIGNUP



Search in Lazada



Lazada Loans

dadario guitar string acoustic | bang supplement | xmax 300 pulley | click v3 decals sticker | air jordan 1 low se mens

Categories ▾



LazMall



Vouchers

Sports & Outdoors > Sports Equipment > Golf > Bags & Covers > Sport Panda Golf Club Carrier, Golf Bag Tubes Organizer Stand for Holding 6 Golf Clubs



Sport Panda Golf Club Carrier, Golf Bag Tubes Organizer Stand for Holding 6 Golf Clubs

★★★★★ 1 Ratings

Brand: No Brand | More Sports Equipment from No Brand

₱821.66

Starts in 2 day(s) 19:37:25

7.7 SUPER SULITIPID SALE JUL 7-11

₱864.00

₱1,439.57 -40%

Installment Up to 3 months, as low as ₱296.64 per month.

Color Family Black+Orange



Quantity

— 1 +

Buy Now

Add to Cart

Delivery Options ⓘ

Metro Manila~Quezon City, Quezon City, Project 6

CHANGE

Ships from Overseas

Standard Delivery

Get by 10-19 Jul

₱40.00

Get a shipping fee discount with ₱999.00 minimum spend from Sport Panda

Cash on Delivery Available for orders below ₱25,000

Return & Warranty ⓘ

7 Days Money Back Guarantee

Warranty not available



Download app to get Free Gift or P60 off Voucher!

View on App

Sold by Sport Panda

Chat

Seller Ratings

Ship on Time Rate

Chat Response Rate

96%

97%

75%

GO TO STORE

Messages

<https://www.amazon.sa/-/en/Holder-Attachment-Organizer-Holding-Practice/dp/B0BRHYGYMG>



联系客服



¥ 57.5 登录查看更多优惠 >

商品已经下架啦~要不要瞧瞧别的~

一键登录

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增值电信业务经营许可证：浙B2-20080224 | 增值电信业务经营许可证（跨地区）：B2-20150210 | 浙网文【2022】0403-017号 | 浙江省网络食品销售第三方平台提供者备案：浙网食A33010001 |

互联网药品信息服务资格证书(浙)-经营性-2023-0008 | 短消息类服务接入代码使用证书:号【2016】00154-A01 | 信息网络传播视听许可证:1109364号 | 出版物网络交易平台服务经营备案号:新出发浙各字第002号 | 药品网络交易第三方平台备案信息:(浙)网药平台备字【2023】第000016-000号 |

浙公网安备 3301020000078 | 浙B-20080224-1 | 广播电视节目制作经营许可证(浙)字第01012 | 市场主体登记注册: 工商网监3301004120 | 医疗广告网络交易备案第3301004120 | 中国扫黄打非网 | 全国文化和旅游市场网上举报投诉处理系统 | 全国12315平台 | 浙江省互联网违法和不良信息举报中心 | 全网举报 | 营业性演出许可证: 浙演经20213300000069



7/3/24, 8:11 PM

Golf Club Carrier - Portable Holder for 6 Clubs – Orionmarts International

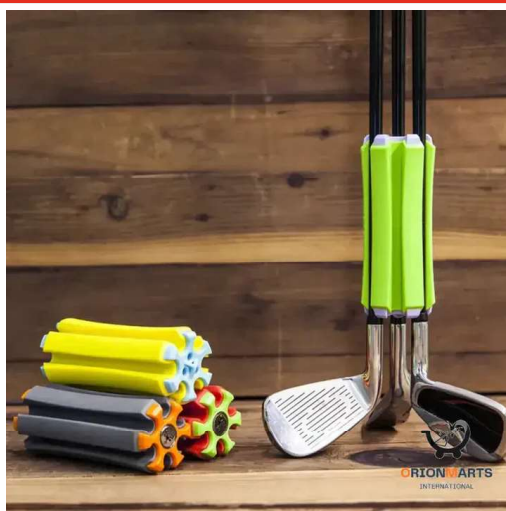


FREE SHIPPING ON ORDERS OVER \$50

+1 (845) 391-7171 info@orionmartsintl.com

Q \$6.68

FREE SHIPPING ON ORDERS OVER \$50



GOLF CLUB CARRIER

\$24.99

Color

Pick a Color

ONLY 1 LEFT

- 1 +

MAKE A SELECTION

00 : 24 : 17

Hours Minutes Seconds

Sale Ends Once The Timer Hits Zero!

PRODUCT DETAILS

Overview:

Holds up to 6 clubs, 3 tees, and features a magnetic ball marker.
 Excellent for the driving range, cart-only, par 3 courses, executive courses, or simulators.
 Keeps grips dry when standing up with clubs.
 Fits in most bags - perfect for cart only.

<https://orionmartsintl.com/products/golf-club-carrier>

USD

1/3

1/4

Looking for specific info?

Product Description :
Simple and Versatile
It just makes golf easier.
Stops clubs knocking together
Transport your clubs easily
Stands up on its own when three or more clubs are inserted.
Package : 1PCs* Golf Club Carrier
Welcome to visit us,if you have any questions, please feel free to ask us. We will give you a very satisfactory shopping experience.

Brand	LVIJMOB
Color	Blue-white
Item Weight	500 g

ASIN	B0C7GT973V
Date First Available	8 June 2023

